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Attorney for the Defendant  
MOHAMMED YOUSEF CHAUDHRY

IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

No. CR 03-40210 SBA (WDB)

Plaintiff,

SUPPLEMENTAL APPLICATION FOR  
ORDER AUTHORIZING SUBPOENAS

v.

MOHAMMED YOUSEF CHAUDHRY,

Defendants. /

I, Erik Babcock make the following declarations under penalty of perjury:

1) I am an attorney duly admitted to practice in this court, and I was appointed pursuant to the provisions of the Criminal Justice Act to represent defendant Mohammed Yusef Chaudhry in the above captioned case.

2) I am informed and believe, and on the basis of said information and belief allege, that Mr. Chaudhry is unable to pay for witness fees and costs of service in connection with issuance of subpoenas for the following persons.

3) I filed an application for subpoenas for these witnesses earlier today, on May 28, 2008. My prior application did not describe the proposed testimony sought from each witness. This application seeks to supplement set forth the the relevance and materiality of each witnesses testimony by describing the same below:

- a. Anthony Armentano: Mr. Armentano can testify concerning his investigation of Clarence Walker, including Walker's accessing IRS databases, and evidence collected

1 from Walker's trash, and related investigation of defendant;

2 b. Wes Pohl: IRS Disclosure Office, Oakland, California. Defendant seeks Mr. Pohl's  
3 testimony concerning procedures for storing, requesting, and disclosing taxpayer  
4 documents;

5 c. John Quigley: IRS Disclosure Office, Oakland, California. Defendant seeks Mr.  
6 Quigley's testimony concerning his response to a subpoena for documents served on  
7 the IRS Disclosure Office in the instant matter.

8 d. Mike Jenkins: IRS Small Business Compliance unit in San Jose. Defendant seeks the  
9 testimony of Mr. Jenkins concerning Clarence Walker's investigation of defendant.

10 e. Janice Tobin: IRS Small Business Compliance unit. Defendant seeks Ms. Tobin's  
11 testimony concerning business documents related to the Title 31 program and her  
12 unit's investigation of defendant.

13 f. Fern Martin: Territory Manager, IRS Small Business unit. Defendant seeks Ms.  
14 Martin's testimony concerning the termination of Clarence Walker's employment with  
15 the IRS, related to the investigation of Walker for crimes committed with Radu  
16 Tomescu and Sheila Wu.

17 WHEREFORE, defendant prays that an order issue:

18 1) Authorizing the issuance of the attached subpoenas.

19 2) Authorizing the costs of witness fees and expenses associated with service of said  
20 subpoenas to be paid as if subpoenaed by the government.

21 3) Ordering the U.S. Marshal's Service to serve said subpoenas.

22 Respectfully submitted,

23 LAW OFFICES OF ERIK BABCOCK

24 DATED: May 28, 2008

25 By: /S/Erik Babcock  
26 ERIK BABCOCK